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COMPLAINT FORM

(for filers who are prisoners without lawyers)

IN THE UNITED STATES DISTRICT COURT

FOR THE Southern DISTRICT OF Indiana

FILED

12/07/2020

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Roger A.G. Sharpe, Clerk

(Full name of plaintiff(s))

Bruce Brown

vs

(Full name of defendant(s))

B & T Bulk, LLC
56315 East Ave
Mishawaka, IN 46545

Case Number:

2:20-cv-649-JPH-MJD

(to be supplied by clerk of court)

A. PARTIES

1. Plaintiff is a citizen of Indiana, and is located at

1946 u.s. Hwy 40 Greencastle Ind. 46135 Putnamville

(Address of prison or jail)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant B & T Bulk

(Name)

is (if a person or private corporation) a citizen of Indiana
(State, if known)

and (if a person) resides at _____
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for B+T Bulk Trucking
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Defendant, B+T Bulk Trucking Co., LLC, did send Plaintiff Brown in an uninsured semitractor-trailor owned by Defendant Company on or around December 4, 2017 en route through Cass County, Logansport Indiana that caused Plaintiff the loss of his commercial driver's license, loss of employment at two (2) separate companies @ \$80,000 annually, loss of liberty, loss of family, caused

irreparable harm and damage, mental and emotional anguish, undue hardship, a continuing wrong, company committed libel and/or defamation of character to Plaintiff's other employer, Doug's Mishawaka Tree Co., Bureau of Motor Vehicles continues to request \$1,000.00 reinstatement fees, proof of insurance information to re-obtain his commercial driver's licence that is suspended. B&T Bulk Trucking, Employer Defendant did with reckless disregard for Plaintiff Brown, Employee's multiple interests above, illegally sent Brown out in an uninsured semi-tractor trailer acting in conscious disregard of a known risk, with gross negligence and outrageous conduct, out of greed (profits) of the company, employer - employee contract, willful and wanton, deliberate indifferent to Plaintiff's rights as an employee. On the way to pick up aggregate concrete powder on a regular route, of no fault of Plaintiff, B&T Bulk by way of fraud misled Plaintiff truck was insured, Plaintiff in the uninsured B&T Bulk Tractor-trailer causing the multiple injuries above that are irreparable, shocking to the conscience to Plaintiff's rights.

C. JURISDICTION

☒ I am suing for a violation of federal law under U.S.C. § 1331.

☒ I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is

\$_____.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

Given B&T Bulk Trucking's culpability, degree of, the extent of the harm/injuries caused by employer defendant, the relationship between the conduct and the harm reasonably related to it, and the likelihood that the award would deter B&T Bulk and others from similar conduct \$25 million dollars for Compensatory, loss of wages, and/or punitive damages - actual damages, attorney fees etc., respectfully.

E. JURY DEMAND

☒ Jury Demand – I want a jury to hear my case

OR

☐ Court Trial – I want a judge to hear my case

Dated this _____ day of _____ 20____.

Respectfully Submitted,

Bruce Brown
Signature of Plaintiff

Bruce Brown 271394
Plaintiff's Prisoner ID Number

1946 W U.S. Hwy 40 Greencastle IN
46135 Putnamville Corr. Facility
(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

REQUEST TO PROCEED IN DISCRICT COURT WITHOUT PREPAYING THE FILING FEE

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.